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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NATIONAL ABORTION FEDERATION
(NAF),

Plaintiff,

vs.

THE CENTER FOR MEDICAL PROGRESS,
BIOMAX PROCUREMENT SERVICES, LLC,
DAVID DALEIDEN (aka "ROBERT
SARKIS"), and TROY NEWMAN,

Defendants.

Case No. 3:15-cv-3522 (WHO)

Judge William H. Orrick, III

**STIPULATON FOR (i)
EXTENSION OF PAGE LIMITS,
AND (ii) EXTENSION OF TIME TO
FILE OPPOSITION TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT (ECF
#665), AND [~~PROPOSED~~] ORDER**

Location: Courtroom 2, 17th Floor

Pursuant to Local Rules 7-3(a), 7-3(c), 7-11(a), and 7-12, Defendants and Plaintiff stipulate and request the Court modify the page limits for the parties' respective opposition and reply briefs regarding Plaintiff's pending motion for Summary Judgment and Entry of Permanent Injunction (ECF #665). Furthermore, pursuant to Local Rules 6-2(a) and 7-3(a) Plaintiff and Defendants stipulate and request the Court to modify the deadlines set by the Court (ECF #663 and 679). Plaintiff and Defendants hereby stipulate and request as follows:

WHEREAS, pursuant to Local Rule 7-3(a), the length of any opposition brief to Plaintiff's motion for summary judgment is limited to 25 pages of text;

WHEREAS, pursuant to Local Rule 7-3(a), the length of any reply brief in support of Plaintiff's motion for summary judgment is 15 pages of text;

WHEREAS, Defendants intend to join in a single opposition brief both the opposition to summary judgment and raise the copyright issues;

WHEREAS, Defendants have determined that to adequately brief all relevant issues for the Court, Defendants would need an expansion of their opposition brief from 25 to 30 pages of text;

WHEREAS, Defendants are still in process of preparing their opposition brief, and will take care to edit it so that it is no longer than needed to adequately brief all relevant issues for the Court;

WHEREAS, Plaintiff has no opposition to this expansion so long as a proportional expansion of Plaintiff's reply brief from 15 to 20 pages is also granted;

WHEREAS, pursuant to Court Order the deadline for Defendants to oppose Plaintiff's motion for summary judgment is December 23, 2020;

WHEREAS, pursuant to Court Order the deadline for Plaintiff's reply to Defendants' Opposition is January 20, 2021;

WHEREAS, pursuant to Court Order the hearing on Plaintiff's motion for summary Judgment is February 3, 2021;

WHEREAS, the depositions of Plaintiff's witnesses occurred on December 9-10, 2020, and Defendants represent that they do not have adequate time to review deposition transcripts and exhibits and to incorporate them into the opposition;

WHEREAS, necessary Defense Counsel have been and will be unavailable due to the

1 holidays and expedited litigation in COVID-19 church closing cases; and

2 WHEREAS, Plaintiff will also need an extension of time to file their reply brief in support of
3 their motion for summary judgment;

4 NOW THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED by the parties,
5 through their undersigned counsel, that:

6 1. The Court issues an order expanding the page limits for Defendants' opposition to
7 summary judgment brief from 25 to 30 pages;

8 2. The Court issue an order expanding the page limits for Plaintiff's reply brief from 15
9 to 20 pages;

10 3. The Court issue an order extending the deadline for Defendants to oppose Plaintiff's
11 motions for summary judgment to Wednesday, January 6, 2021;

12 4. The Court issue an order extending the deadline for Defendants to file their reply to
13 their motion for summary judgment to Friday, February 5, 2020; and

14 5. The Court issue an order moving the hearing date on Plaintiff's motion for summary
15 judgment from February 3, 2021 at 2:00 p.m. to February 17, 2021 at 2:00 p.m. (or to a later date
16 and time that more convenient for the court).

17 Respectfully submitted,

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Attestation Pursuant to Civ. L.R. 5.1(i)(3)

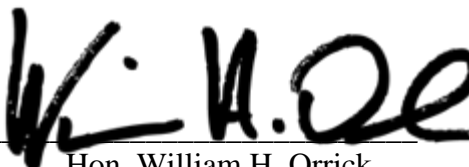
As the filer of this document, I attest that concurrence in the filing was obtained from the other signatories.

/s/ Mark P. Meuser
Mark P. Meuser
Counsel for Defendants

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 16, 2020



Hon. William H. Orrick
United States District Judge